

# Exhibit A

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	:
JOHNNY M. HUNT	:
	:
Plaintiff	:
	:
vs.	:
	:
	3:23-CV-00243
SOUTHERN BAPTIST CONVENTION,	:
GUIDEPOST SOLUTIONS, LLC, and	:
EXECUTIVE COMMITTEE OF THE	:
SOUTHERN BAPTIST CONVENTION	:
	:
Defendants	:
	:
	X

Also present: Orson Braithwaite, Official  
Videographer, Johnny M. Hunt, plaintiff  
REPORTED BY: Louisa B. McIntire-Brooks

<p style="text-align: right;">Page 226</p> <p>1 representatives?</p> <p>2 A. Yes.</p> <p>3 Q. How many board representatives do they</p> <p>4 have?</p> <p>5 A. Two.</p> <p>6 Q. Two? Who else is on the board?</p> <p>7 A. Kevin Keene and Bart Schwartz and Anthony</p> <p>8 Collura.</p> <p>9 Q. How do you spell Mr. Collura's name?</p> <p>10 A. C-O-L-L-U-R-A.</p> <p>11 Q. Is your chief legal officer?</p> <p>12 A. Yes.</p> <p>13 Q. And chief operating officer?</p> <p>14 A. Yes, and me.</p> <p>15 Q. And you? What are the names of the</p> <p>16 Carriage House representatives?</p> <p>17 A. It's Kevin Keen and Anthony Collura are</p> <p>18 really representing them.</p> <p>19 Q. So you have a total of four board members?</p> <p>20 A. Yes. I would like to follow-up with</p> <p>21 additional information on that, yes.</p>	<p style="text-align: right;">Page 228</p> <p>1 A. Yes.</p> <p>2 Q. At the time this report was issued, did you</p> <p>3 get any congratulatory texts from any of the board</p> <p>4 members?</p> <p>5 A. I don't recall.</p> <p>6 Q. Who else did you get texts from? We have a</p> <p>7 screenshot or two of a text from you, congratulatory in</p> <p>8 nature, but we don't have all your texts yet, we're</p> <p>9 awaiting a court ruling. Who else did you get texts</p> <p>10 from associated with this report?</p> <p>11 A. I don't recall.</p> <p>12 Q. Did you text your investigatory team from</p> <p>13 time to time about the report?</p> <p>14 A. I don't recall specifically.</p> <p>15 Q. Do you recall generally doing texting on</p> <p>16 the reports at some point?</p> <p>17 A. After the report was published?</p> <p>18 Q. Before.</p> <p>19 A. Yes.</p> <p>20 Q. How frequently would you text about the</p> <p>21 contents of this report?</p>
<p style="text-align: right;">Page 227</p> <p>1 Q. You don't know of any additional board</p> <p>2 members?</p> <p>3 A. No, I think that's -- the Carriage House</p> <p>4 representatives are Kevin Keen and Anthony Collura.</p> <p>5 Q. So you only have four board members, is</p> <p>6 that what you're testifying to?</p> <p>7 A. Yes, that's my recollection.</p> <p>8 Q. How do you have -- what happens in a case</p> <p>9 of a two to two tie?</p> <p>10 A. I'll need to double check. Sorry about</p> <p>11 that.</p> <p>12 Q. How often does your board meet?</p> <p>13 A. It meets on occasion when needed.</p> <p>14 Q. Quarterly?</p> <p>15 A. No, as needed.</p> <p>16 Q. Do you have annual meetings?</p> <p>17 A. Yes, we meet annually or by e-mail.</p> <p>18 Q. So you said SolutionPoint International is</p> <p>19 the owner of your company?</p> <p>20 A. Yes.</p> <p>21 Q. And are they a hundred percent owner?</p>	<p style="text-align: right;">Page 229</p> <p>1 A. Before the report was published?</p> <p>2 Q. Before the report was issued.</p> <p>3 A. It depends on the time period.</p> <p>4 Q. Would you text, generally speaking, with</p> <p>5 the senior investigatory team from time to time, text</p> <p>6 with them on information and issues pertaining to the</p> <p>7 report?</p> <p>8 A. Not usually. By senior investigative team,</p> <p>9 you mean Samantha and Russ or do you mean other people?</p> <p>10 Q. Yes.</p> <p>11 A. Okay. Not usually, so as they would text</p> <p>12 me, I wouldn't really be texting -- I wouldn't initiate</p> <p>13 a text.</p> <p>14 Q. You would respond to their texts?</p> <p>15 A. Usually.</p> <p>16 Q. These responses would be information</p> <p>17 pertaining to the report specifically in some cases?</p> <p>18 A. They worked on multiple matters.</p> <p>19 Q. Including this one?</p> <p>20 A. Yes.</p> <p>21 Q. You would text from time to time on this</p>

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1 matter, this report involving Pastor Johnny Hunt?

2 A. My recollection is they would text me

3 occasionally on the Johnny Hunt specific matter.

4 Q. You would from time to time text them back?

5 A. Yes.

6 Q. Now, when you text people, in your ordinary

7 course of business on matters such as Pastor Johnny

8 Hunt, would you text, generally speaking, on the same

9 day or would it be a day or so response?

10 A. It depends.

11 Q. Did you text with Krista Tongring

12 associated with this particular report?

13 A. The report pertaining to Johnny Hunt or the

14 report overall?

15 Q. Generally. The report?

16 A. Yes.

17 Q. You texted with Sunny Lee as well on this

18 report that's at issue in this case; right?

19 A. I don't recall that, but I have no reason

20 to dispute it.

21 Q. Christina Bischoff, you texted with her on

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1 this report as well; right?

2 A. I don't recall that, but I have no reason

3 to dispute it.

4 Q. Again, Bruce Frank, you texted with him

5 occasionally with respect to this report?

6 A. Yes.

7 Q. Now, ma'am, I want to go back to comparing,

8 I want to go back to your report and comparing, again,

9 in another way the information that, this issue of

10 reciprocation. We talked about that. What does

11 reciprocation mean to you or what did it mean to you at

12 the time you reviewed and approved this report?

13 A. I don't recall thinking specifically about

14 the reciprocation line at the time I reviewed the

15 report.

16 Q. But in any event, what your report said

17 "survivor did not reciprocate"; right, you've seen that

18 with your own eyes this morning or this afternoon?

19 A. Yes, that's correct.

20 Q. And then Alisa Womack's response, that we

21 have covered before, was not included at all in the

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1 report. Agreed?

2 MR. KLEIN: Objection.

3 Q. Her response of, "I'll try to keep up," do

4 you remember that?

5 MR. KLEIN: Objection, asked and answered.

6 MR. MACGILL: My mistake. Give me a

7 second.

8 Q. Ma'am, I want to go back to Exhibits 7 and

9 8 and I want to contrast what's in your investigatory

10 file with what is in the report. There is, in your

11 file, the Womacks had told your investigators and your

12 company that Johnny Hunt had said he was going for a

13 jog and Alisa asked him if she could join. Do you

14 recall that? That being reported to you by Alisa

15 Womack?

16 A. Nothing was reported to me. I defer to the

17 investigators as what was reported to them.

18 Q. And that was reported to the investigators?

19 A. I defer to the investigators of what they

20 said and what the investigative files said.

21 Q. Did you have personal knowledge of this

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1 before the report was issued?

2 A. Personal knowledge, no.

3 Q. Did you have knowledge that this has been

4 reported to your investigators?

5 A. I had some awareness. A jog sounds

6 familiar, but I don't have any specific recollection so

7 I'm not able to answer any specific questions on that

8 piece.

9 Q. So you don't have any -- make sure, I want

10 to be exact on this. You don't know from your own file

11 that in the Guidepost file there is a reference to "on

12 Tuesday morning," referring to Pastor Johnny Hunt, "he

13 said he was going for a jog and Alisa asked if she

14 could join." You don't recall any such information in

15 the file of Guidepost?

16 A. I have not seen the file of Guidepost so

17 I'm not able to speak to what is in there.

18 Q. Well, you have seen some of the materials

19 in the files; right?

20 A. Yes.

21 Q. But you don't recall that specific report